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By email to: housing2040@gov.scot

Housing to 2040
Scottish Government

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Our case ID: 300041870

28 February 2020

Dear Ms Campbell,

Housing to 2040 – Consultation on outline policy options

Thank you for seeking our views on the draft vision for the future of our homes and communities included within the [Housing to 2040: A Conversation](#) Document (9 July 2019)'. We also welcome your call for suggestions on delivering high quality, energy efficient housing that is affordable and meets everyone's needs. We offer the following comments and recommendations on behalf of Historic Environment Scotland which is the lead public body set up to investigate, care for and promote Scotland's historic environment.

We are responsible for leading and enabling the delivery of Scotland's historic environment strategy, [Our Place in Time](#) (2014) and our priorities are set out in our corporate plan, [Heritage for All](#) (2019).

Key Recommendations

We believe that a key aspect of delivering the Housing to 2040 vision must be through investment in the on-going maintenance, use and re-use of our already existing buildings and places. This will be essential in meeting the challenges of climate change and our current target of achieving net zero emissions by 2045. Investment is also required to sustain the value of our historic environment and the important contribution it makes to our well-being, economic prosperity and the quality of our places.

We therefore have the following recommendations for adapting our current housing system to meet the challenges identified in this consultation paper.



1. Supporting a culture of on-going use, care and maintenance

A culture of on-going use, care and maintenance for our existing housing is necessary to address current levels of vacancy, degradation and loss occurring to our built environment, noting that this has an impact on housing supply as well as on the quality of our historic environment. Some of the practical challenges concerning the ongoing maintenance of existing buildings have recently been explored in depth by the [Scottish Parliamentary Working Group on Tenement Maintenance](#) and we welcome that the recommendations from this work are currently being explored by The Scottish Government. Effective care and maintenance is also necessary to ensure that our existing buildings can withstand the effects of our changing climate.

We recommend that culture change is promoted through awareness-raising and incentivised by financial and practical support offered for building maintenance and restoration works. This should also involve the review of taxation structures affecting our existing buildings, especially Value Added Tax (VAT) on conservation, maintenance and repair work.

2. Improving energy efficiency while safeguarding cultural significance

The global climate emergency has created a pressing requirement for the re-use and adaptation of our existing buildings and places, recognising that the energy and carbon used in their manufacture and construction has already been spent. Our changing climate is also altering how our buildings perform and decay. We must therefore recognise the value of our existing buildings and places in addressing climate change and ensure they are adapted. Appropriate adaptation is, however, necessary to ensure that approaches which may harm the fabric or cultural significance of our historic buildings are avoided.

We recommend the development of strategies and programmes for the upgrading and adaptation of our existing buildings and places, underpinned by close engagement with the heritage sector. HES has undertaken extensive and pioneering work on climate change adaptation. Our [Climate Action Plan 2020-25](#) sets out how we plan to share knowledge, build resilience and support others in addressing the climate emergency. We have also issued guidance on [Climate Change Impacts](#) (HES, 2019) and the [Use and Adaptation of Listed Buildings](#) (HES, 2019) and technical information on [Fabric Improvements for Energy Efficiency in Traditional Buildings](#) (2013). We recommend that this knowledge and experience is utilised across the housing sector.

3. Encouraging creative adaptation

The upgrading and adaptation of our existing buildings to accommodate our population diversity and changing demographics is necessary to ensure their continued use and, in some instances, can provide opportunities for restoration works to occur. Any adaptation works should, however, be undertaken creatively and with a clear understanding of a building's cultural significance. This is so that



their overall contribution to our historic environment and the quality of our places is not damaged or lost.

We recommend the development of strategies and programmes for the adaptation of our existing buildings and places, underpinned by close engagement with the heritage sector. We have developed [Policy](#) (HEPS, 2019) and published detailed guidance on the [Use and Adaptation of Listed Buildings](#) (HES, 2019) with the aim of supporting adaptation works to historic buildings. This guidance sets out a variety of approaches adapting our historic buildings from minimal intervention to selective demolition. [Case studies](#) can also be found on our website which illustrate these approaches. We are also undertaking further work on specific topic of accessibility and will refresh our managing change guidance note on this in due course. We recommend that this knowledge and experience is utilised across the housing sector.

4. Changing current models of housing delivery

Current models of housing delivery are led by speculative development that does not favour the re-use and adaptation of our existing buildings and places. Our systems of delivering housing should therefore be adapted to promote development which sustains and enhances our already existing buildings and places. This is of critical importance in maintaining the value of our historic environment and the wider benefits it brings to the quality of our places, well-being and economic prosperity.

We recommend that the public sector should take positive steps in leading and enabling the delivery of housing which makes positive use of our existing buildings and places. This should be driven by national policy for the re-use and adaptation of our existing buildings and the prioritisation of brownfield sites and Vacant and Derelict Land (VDL) for housing delivery. We also would encourage the public sector to explore models of sharing the financial risks of restoring our historic buildings and places for housing delivery. This may be through grant funding or models of Public Interest Led Development (PILD). We also suggest the public sector should create forums and offer practical support to restoring developers.

5. Learning from our existing buildings and places

Any new build housing development delivered should serve to support the distinctive character, resilience and prosperity of our existing communities and places. This is essential in the delivery of development that is sustainable and contributes to the overall quality of our places.

We recommend that the design of new housing should reinforce the distinctive characteristics of our places. This should be done by showing an appreciation of the historic development of a place, as well as its urban forms, spaces and street patterns. It should also be noted that our existing



buildings can provide design cues for future development. Many older homes, including Council-built housing, display a quality of craftsmanship and were built with good space standards that often exceed today's. Older homes are also often designed to fit a specific environment and constructed from local materials.

6. Equipping and resourcing our planning system

As key aspect of delivering high quality housing will heavily depend upon equipping and resourcing local authority planning departments to enable development which enhances our existing places and, also, to resist poor quality housing that is not sustainable. Skilled local authority planning and heritage officers, in particular, are required to promote the re-use of our historic buildings and places for housing and also to ensure that any upgrading or adaptation works are undertaken appropriately. Resource and tools are also required to enforce against the neglect and abandonment of our existing buildings.

We recommend that planning and heritage services should be appropriately resourced, equipped and supported to perform their role effectively.

7. Developing heritage and conservation skills

Investment in maintenance, re-use and adaptation should be supported by the development of skills in heritage and conservation. It is important that planning authorities have access to heritage expertise in enabling the sensitive re-use or existing buildings and places. We also know that skills shortages exist across the construction sector for the maintenance and upgrading of our traditional buildings. There is an on-going requirement for stonemasonry and roofing skills for historic buildings, for example, as well as skills shortages in traditional joinery, lime plastering, conservation architects and surveyors.

We recommend investment in the development of heritage and conservation skills to meet the current challenges affecting our housing system.

8. Utilising our existing expertise

Important work is already occurring across the heritage sector for the maintenance, re-use and upgrading of our buildings and places. As lead body for the historic environment, we have undertaken extensive work in the development of [policy](#), [guidance](#) and [technical advice](#) on this. We have also produced a guide to [climate change impacts](#) and [climate action plan](#) in order to address added pressures created by the climate emergency. The Our Place in Time (OPIT) Built Heritage Investment Group are also developing a tool for the prioritisation of investment in our built heritage. There is also an aligned [Skills Investment Plan for Scotland's Historic Environment Sector](#) (HES, 2019).

We therefore strongly recommend further engagement with a range of heritage management practitioners in the delivery of the Housing to 2040 vision.



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Our detailed comments on the questions included in the consultation paper are included in the attached Annex.

I hope this is helpful. Should you wish to discuss our comments in more detail, please feel welcome to contact Alison Baisden on 0131 668 8575 or at Alison.Baisden@hes.scot.

Yours sincerely,

Barbara Cummins
Director of Heritage

Historic Environment Scotland



Annex: Consultation questions

We have provided the following comments in relation to the questions included in the consultation paper and would be happy to provide further information in support of these, or other related matters, should this be helpful.

Q1 *Do you have any comments on the draft vision and principles included in the 'Housing to 2040: A Conversation' Document (9 July 2019)?*

Overall, we welcome the aspirations included within the Housing to 2040 vision that our housing system should function well, meet people's needs and promote sustainable high-quality homes and communities. We believe, however, that greater emphasis should be placed on the on-going care, maintenance and re-use of our existing buildings and places. This would bring the Housing to 2040 vision and principles into alignment with the recommendations included within the recent Infrastructure Commission for Scotland [Phase 1 Report](#) (January 2020). The Phase 1 Report sets out that it is essential that our existing infrastructure assets, including our built environment resource, should be effectively and efficiently utilised, maintained and enhanced to net zero carbon readiness (Recommendation 03) and that 'place' should be put at the heart of coherent infrastructure prioritisation and planning (Recommendation 02).

These approaches are of critical importance in maintaining the value of our historic environment and the wider benefits it brings to the quality of our places, well-being and economic prosperity. It should be noted that approximately 40% of buildings on the [Buildings at Risk Register for Scotland](#) (HES, January 2020) are residential and that this is the largest classification within the Register. We also understand that the most recent [housing condition survey](#) (Scottish Government, 2018) found that 75% of all dwellings have some degree of disrepair, with 30% of dwellings requiring urgent repair. Degradation and loss caused to our existing housing therefore not only has a pronounced effect on Scotland's housing supply, but also on the overall health of our historic environment and the resultant quality of our places.

A key aspect of delivering the housing we need must come from caring for, maintaining and upgrading our existing buildings and places. This is especially pressing given the current challenges presented by our changing climate and a context of fewer resources. Using our existing buildings and places to meet our future housing needs can create efficiencies and would also significantly reduce Scotland's carbon expenditure. It should also be noted that our changing climate is likely to exacerbate existing issues caused by the poor maintenance of our buildings and places, and it is therefore critical that preventative action is taken to ensure our existing housing is fit for the future.

We therefore welcome the focus given to the repair and maintenance of our existing homes in this consultation and have provided further comments on this at



Q6. We are also in general support of proposals for the upgrading and adaptation of existing homes included at Principle 9 and Principle 14 of the Conversation Document. It will be critical, however, that any upgrading and adaptation works occurring to historic buildings should be undertaken with an awareness of their construction, function and cultural significance. This is so that their overall contribution to our historic environment and the quality of our places is not damaged or lost. We are able to provide [technical information](#) and advice on [managing change](#) to historic buildings and would encourage further dialogue on emerging strategies or programmes for upgrading and adaptation works.

We also suggest caution and further dialogue at Principle 7 which advocates for the demolition of homes that cannot be 'reasonably' adapted. National policy included within the [Historic Environment Policy for Scotland](#) (HEPS, 2019) and [Scottish Planning Policy](#) (SPP, 2014) makes clear that our existing historic buildings, listed or undesignated, should be protected and preserved wherever feasible and alternatives should be explored before their loss. This is necessary to ensure that the understanding, enjoyment and benefits provided by our historic environment are secured for the future. Demolition should also be avoided to reduce carbon costs. We have published a guidance note on the [Use and Adaptation of Listed Buildings](#) (HES, 2019) and produced a series of best practise [case studies](#) which demonstrate ways of ensuring the continued use and re-use of our buildings. We also consider that the public sector should take a lead in sharing the costs of works for the restoration and re-use of our homes.

Finally, we fully support Principle 10 which specifies that new housing, and associated community resources, should only be provided where it can help to create safer, stronger, attractive, sustainable and integrated communities. In our view, new housing development should serve to support the distinctive character, resilience and prosperity of our existing communities and places. In line with this, we consider that opportunities for the re-use of empty buildings, brownfield sites and Vacant and Derelict Land (VDL) within our existing places should be prioritised in the delivery of new housing and associated community development. We also consider that the design of any new development should reinforce the distinctive characteristics of a place. This should be done through showing an appreciation of the historic development of a place, as well as its urban forms, spaces and street patterns.

Q2 *Do you have any comments on the scenarios and resilience of the route map or constraints?*

A key driver of change affecting Scotland's housing delivery is the current Climate Emergency and target of achieving net zero emissions by 2045. This creates a pressing requirement for us to care for, maintain and re-use of our existing buildings and places, recognising that the energy and carbon used in their manufacture and construction has already been spent. It should be noted, for example, that more than 70% of the building stock that will exist in the year 2050



has already been built ([Sustainable Development in Government Report](#), 2006). Our changing climate is also altering how our buildings perform and decay. Increases in warmer temperatures and wet weather accelerate building decay, and extreme weather events can cause catastrophic failure. These changing conditions can also expose longer standing problems within our existing building stock, such as a lack of building maintenance and the use of incompatible materials during repairs.

We therefore consider that it is critical that current models of housing delivery are adapted to favour the care, maintenance and re-use of our existing buildings and places. We have identified a number of barriers to this which require consideration so that the best use of our existing buildings and places is made.

The existing application of taxation, especially Value Added Tax (VAT) on conservation, maintenance and repair work, has been raised in recent years as an issue in the upkeep of our historic buildings and places. These VAT charges can be perceived as a disincentive to owners and developers undertaking maintenance and adaptation works. They also run-against wider priorities for ensuring resource efficiency and environmental sustainability. We have anecdotal evidence, for example, that developers would rather demolish building rather than pay additional VAT for their refurbishment. We therefore recommend that taxation structures are reviewed around our already existing building stock. Taxation reform has resulted in a substantial increase in funding for conservation projects in other European nations. In Italy, for instance, graduated tax relief and other fiscal benefits (under the 'Arts Bonus' tax scheme) are granted to private sector corporations funding the conservation of historic buildings. We note that this relief has been reviewed by the European Union and is not classified as State Aid.

Additionally, we have noticed that the re-use, adaptation and upgrading of historic buildings for housing can appear unattractive to speculative developers. This is can be because of higher costs associated with restoration works as well as an overall lack of expertise in the conservation and adaptation of such buildings. It is therefore critical that the public sector should take a principal role in leading and enabling the re-use of our existing buildings and places for housing delivery.

We recommend that this is driven by national level policy and standards for the upkeep and adaptation of our existing buildings for housing. It should be noted that the recently adopted [Historic Environment Policy for Scotland](#) (HEPS, 2019) requires that decisions affecting the historic environment should secure its benefits while contributing to the sustainable development of our communities and places. This means that there is already an expectation that our historic buildings, including homes, should be retained and used for the benefit of our communities. We recommend that any new housing policy should therefore align with this and be subject to appropriate monitoring. We also suggest that the re-use of our existing building stock for housing should be incentivised through financial and practical support offered to restoring developers.



We also would encourage local authorities to explore models of [Public Interest Led Development](#) (PILD) where the financial risks of restoring our historic buildings and places for housing delivery are shared. Such models of housing delivery should be supported by place-based approaches which recognise the importance of our historic environment and the contribution it can make to meeting wider social and economic objectives.

Investment in the maintenance, re-use and adaptation should also be supported by appropriate resourcing and skills development. Planning authorities, for example, should have access to skilled planning and heritage officers with the capacity to bring forward projects for the utilisation and adaptation of historic buildings and structures. This is not only necessary to promote the re-use of our historic buildings and places - but is also essential to ensure that any upgrading or adaptation works are undertaken with an understanding of the construction, function and cultural significance of historic buildings. This is so that their overall contribution to our historic environment and the quality of our places is not damaged or lost.

Similarly, we know that skills shortages exist across the construction sector for the maintenance and upgrading of our traditional buildings. There is an on-going requirement for stonemasonry and roofing skills for historic buildings, for example, as well as skills shortages in traditional joinery, lime plastering, conservation architects and surveyors. Research on this and an action plan for investment in historic environment skills can be found in our [Skills Investment Plan](#) (HES, March 2019).

Q3 *Do you have any proposals that would increase the **affordability** of housing in the future?*

There is clear evidence that we are not making effective use of our already existing housing and we consider that this has a knock-on effect on housing supply and affordability. Information from the [National Records of Scotland](#) (2017) shows that 3% of all of Scotland's dwellings are vacant. We also understand from the [housing condition survey](#) that 75% of all dwellings have some degree of disrepair. It should also be noted that approximately 40% of buildings on the [Buildings at Risk Register for Scotland](#) (HES, January 2020) are residential and that this is the largest classification within the Register.

A significant volume of housing can therefore be brought back into the marketplace through re-use, repair and maintenance. This route can deliver housing at a faster rate than new build development as there is often no requirement to design, construct and seek permission for repair and maintenance works. The re-use and repair of vacant buildings for housing also brings wider benefits to our historic environment while simultaneously contributing to the quality of our places and driving economic activity. We have identified a particular issue



with empty homes above shops in town centres, for example, and consider that re-use of these spaces can help drive town centre regeneration.

A key area of our work has been to support the re-use of empty buildings for housing delivery. This is underpinned by the [Historic Environment Policy for Scotland](#) (HEPS, 2019) which requires that decisions affecting the historic environment should contribute to the sustainable development of our communities and places. We have therefore published guidance on the [Use and Adaptation of Listed Buildings](#) (HES, 2019) which includes information on approaches to secure the continued use or re-use of buildings as well as advice on minimising risk to empty or underused buildings. We have also produced a [Buildings at Risk Toolkit](#) which offers solutions for property that is vacant or at risk, and a series of best practise [case studies](#) which demonstrate successful examples of re-use. We recommend that such approaches are promoted and not limited to designated historic assets.

We also suggest that additional funding is offered for the re-use and refurbishment of existing buildings for housing. We currently offer a [Historic Environment Repair Grant](#), and the [Conservation Area Regeneration Scheme](#) (CARS) for the maintenance and re-use of existing buildings. We note that CARS funding has been utilised to great effect on projects in Campbeltown in Argyll and Bute. Here, heritage and housing initiatives have combined to resolve and bring back into use a number of empty and poorly maintained houses. We also understand that Argyll and Bute Council have promoted the re-use of homes through providing grant funding to people moving into the area for work.

We are also keen to highlight the work of Shelter Scotland's [Scottish Empty Homes Partnership](#) which is currently pursuing initiatives for the re-use of empty homes. A good example is the work of the Empty Homes Partnership with Orkney Islands Council on the re-use of rural housing on North Ronaldsay. This project has taken a multi-agency approach to the improvement of existing infrastructure and employment with the aim of attracting young people and families to the area.

More generally, we consider that local authorities should be equipped with tools and resources to repair and bring empty buildings into use for housing. This could include more scope to use Compulsory Purchase Order or Compulsory Lease powers where property is at risk. The recent Compulsory Purchase of a Category C listed detached house at Roseangle in Dundee is a good example of where such powers have been used with success. A case study of this project is available on the Scottish Government [website](#).

Q4 *Do you have any proposals that would increase the **accessibility and/or functionality** of existing and new housing (for example, for older and disabled people)?*



The [Historic Environment Policy for Scotland \(HEPS 2019\)](#) requires that decisions affecting our historic environment should be informed by an inclusive understanding of the potential consequences for people and communities. Proposals for the adaptation of our existing housing to accommodate population diversity and our changing demographics should therefore be welcomed. The upgrading and adaptation of our existing buildings is also necessary to ensure their continued use and, in certain instances, can provide opportunities for restoration works to be undertaken.

Any adaptation works should, however, be undertaken with a clear understanding of a building's historic character and cultural significance. This is so that their overall contribution to our historic environment and the quality of our places is not damaged or lost. We have published detailed guidance on the [Use and Adaptation of Listed Buildings](#) (HES, 2019) with the aim of supporting adaptation works to historic buildings. This document sets out a variety of approaches adapting our historic buildings from minimal intervention to selective demolition. [Case studies](#) can also be found on our website which illustrate these approaches. We are also undertaking further work on specific topic of accessibility and will refresh our managing change guidance note on this in due course.

A recent good example of the re-use of an existing building for supported accommodation for the elderly exists with the granting of planning permission for the conversion of the old [Kelso High School](#) in the Scottish Borders.

Any programmes of upgrading and adaptation works should also be underpinned by appropriate skills development and resourcing. We consider that there is a particular requirement for planning and heritage specialists with the capacity to bring forward projects for the adaptation of historic buildings and structures. This is not only necessary to promote re-use - but is also essential to ensure that any works for the upgrading and adaptation of our historic structures are undertaken appropriately. Similarly, we know that conservation skills shortages exist across the construction sector for the maintenance and upgrading of our traditional buildings.

Q5 *Do you have any proposals that would help us respond to the global climate emergency by **increasing the energy efficiency and warmth and lowering the carbon emissions** of existing and new housing?*

The global climate emergency has created an urgent requirement for the re-use and adaptation of our existing buildings and places, recognising that the energy and carbon used in their manufacture and construction has already been spent. Our changing climate is also altering how our buildings perform and decay. Increases in warmer temperatures and wet weather accelerate building decay, and extreme weather events can cause catastrophic failure. These changing conditions can also expose longer standing problems within our existing buildings,



such as a lack of building maintenance and the use of incompatible materials during repairs.

We therefore consider that any future housing policy should, in the first instance, encourage a culture of re-use, maintenance and repair for our existing buildings. This should be underpinned by financial incentives and the review of taxation structures affecting them, for example Value Added Tax (VAT) on conservation, maintenance and repair work.

Any works undertaken to upgrade our historic buildings for energy efficiency and climate change should, however, be undertaken with an awareness of how traditional buildings are constructed and function. This is so that approaches which may harm the fabric or special interest of our historic buildings are avoided.

There can often be a perception that our traditional buildings can be difficult to upgrade and adapt to meet the challenges of climate change. It should be noted, however, that many of our historic buildings have been constructed using locally sourced materials and skills and have a low operational energy. These buildings are also inherently designed to be repaired and have experienced ongoing refurbishment throughout their lifespan. They can therefore teach us about the application of traditional techniques to improve energy efficiency and lower carbon emissions.

As lead body for the historic environment we have undertaken extensive and pioneering work on the adaptation of our historic buildings and places to meet the challenges of Climate Change. Our [Climate Action Plan 2020-25](#) sets out how we plan to share knowledge, build resilience and support others in addressing the climate emergency. We have also issued guidance on the [Use and Adaptation of Listed Buildings](#) (HES, 2019) and technical information on [Fabric Improvements for Energy Efficiency in Traditional Buildings](#) (2013). We would therefore encourage further engagement on emerging strategies or programmes for upgrading and adaptation works.

We also recommend that any programmes of climate change adaptation works should be underpinned by appropriate skills development and resourcing. We consider that there is a particular requirement for planning and heritage specialists with the capacity to bring forward projects for the adaptation of historic buildings and structures. This is not only necessary to promote re-use - but is also essential to ensure that any works for the upgrading and adaptation of our historic structures are undertaken appropriately. Similarly, we know that conservation skills shortages exist across the construction sector for the maintenance and upgrading of our traditional buildings.

Q6 *Do you have any proposals that would improve the **quality, standards and state of repair** of existing and new housing?*



We consider that any new housing policy should promote a culture of re-use, maintenance and repair across our existing built environment. The most recent [housing condition survey](#) (Scottish Government, 2018) found that 75% of all dwellings have some degree of disrepair, with 30% of dwellings requiring urgent repair. It should also be noted that approximately 40% of buildings on the [Buildings at Risk Register for Scotland](#) (HES, January 2020) are residential. Repair and maintenance is therefore necessary to address current levels of degradation and loss occurring to our residential buildings, noting that this has an impact on Scotland's housing supply as well as on the health of our historic environment. Repair and maintenance of is also necessary in meeting the challenges of our changing climate and our current target of achieving net zero emissions by 2045.

We know that the existing application of taxation, especially Value Added Tax (VAT) on conservation, maintenance and repair work, has been raised in recent years as an issue in the upkeep of our historic buildings and places. These VAT charges can be perceived as a disincentive to owners and developers undertaking maintenance and adaption works. They also run-against wider priorities for ensuring resource efficiency and environmental sustainability. We have anecdotal evidence, for example, that developers would rather demolish building rather than pay additional VAT for their refurbishment. We therefore recommend that taxation structures are reviewed around our already existing building stock. We also recommend that repair and maintenance works are incentivised through financial support and the provision of practical advice.

Technical advice on common problems and appropriate repairs to traditional buildings is available through the Engine Shed [website](#). We also know that BEFS have been working on [solutions](#) to assist and compel owners of tenement properties in Scotland to maintain their buildings. We would also encourage investment in the development of appropriate skills for the conservation, repair and maintenance of our historic environment. Research undertaken in support of the [Skills Investment Plan for Scotland's Historic Environment Sector](#) (HES, 2019) identifies gaps in traditional building and conservation skills, for example.

We also consider that local authorities should be equipped with tools and resources to enforce against the neglect and abandonment of our existing buildings. This could include more scope to use Compulsory Purchase Order or Compulsory Lease powers where property is at risk.

More generally, we consider that any new build housing delivered should be of a design and standard that contributes to the overall quality of our places. In particular, we recommend that new development should reinforce the distinctive characteristics of our places. This should be done by showing an appreciation of the historic development of a place, as well as its urban forms, spaces and street patterns. It should also be noted that our existing buildings can provide design cues and lessons for the delivery of new development. Many older homes,



including Council-built housing, have large windows, high ceilings and were built with good space standards that often exceed today's. Older homes are also often designed and constructed to fit a specific environment. The Blackhouses on the Isle of Lewis, for example, were built low into the landscape, with rounded corners and thick walls to give protection and insulation against the strong Atlantic winds.

As key aspect of delivering high quality new build development must come from empowering and resourcing local authority planning departments to enable forms of development which seek to enhance our existing places, and to resist poor quality housing that is not sustainable and does not contribute to the quality of our places.

Q7 *Do you have any proposals that would improve the **space around our homes** and promote connected places and vibrant communities?*

In our view, the delivery of housing should serve to support the distinctive character, resilience and prosperity of our existing communities and places. In line with this, we consider that opportunities for the re-use of empty buildings, brownfield and Vacant and Derelict Land (VDL) within our existing places should be prioritised in the delivery of new housing and associated community development. These approaches not only encourage reinvestment in our historic environment, but they can also bring pronounced benefits to community well-being and promote economic activity.

Our historic buildings and features enrich our places and can contribute to our sense of identity and civic pride. Targeting investment toward their re-use and on-going care can therefore support the wellbeing of communities. The quality of our historic environment is also key driver for our tourism growth and can often stimulate the regeneration of places.

The delivery of housing which prioritises investment in our existing buildings and places should therefore be incentivised through financial and practical support offered to restoring developers. In addition to this, we would encourage the public sector to take a lead in the re-use of historic buildings for housing. This could be done through the exploration of models of Public Interest Led Development (PILD) where the financial risks of restoring our historic buildings and places for housing delivery are shared. We also consider that housing delivery should be supported by a planning system empowered to enable forms of development which enhance our existing places, and to resist poor quality housing that is not sustainable and does not contribute to the quality of our places.

We are also keen to champion place-based approaches as a way of effectively delivering the housing we need. We welcome the recent adoption of the Place Principle by Scottish Government and COSLA, which seeks to co-ordinate resources and investment in developing a vision for particular places. Holistic and multi-agency approaches can reverse the decline of places and encourage



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repopulation and the re-use of buildings. We are keen therefore to engage as part of such projects.

Historic Environment Scotland

28 February 2020

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